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Attorneys for Defendants
DNF ASSOCIATES, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

RONALD VIERNES,
And all others similarly situated

Plaintiffs,
vs.

DNF ASSOCIATES, LLC

Defendant.

Civil No.: 19-00316 JMS/KJM

**DEFENDANT DNF ASSOCIATES,
LLC'S FED. R. CIV. P. 26
DISCLOSURE; CERTIFICATE OF
SERVICE**

**DEFENDANT DNF ASSOCIATES, LLC'S FED. R. CIV. P. 26
DISCLOSURE**

Pursuant to Fed. R. Civ. P. 26(a)(1), Defendant DNF Associates, LLC (“DNF”) makes the following initial disclosures. DNF reserves the right to amend, alter, or restate these disclosures as discovery proceeds.

Pursuant to Rule 26(a)(1)(A)(i)

The following individuals may have discoverable information that DNF may use to support its claims and defenses:

1. David J. Maczka c/o Lipps Mathias Wexler Friedman LLP, 50 Fountain Plaza, Suite 1700, Buffalo, New York 14202. Mr. Maczka is DNF's Chief Compliance Officer and may have information regarding the allegations in the Complaint and Answer with Affirmative Defenses.
2. Ronald Viernes c/o Justin A. Brackett, 515 Ward Avenue, Honolulu, Hawaii 96814. Mr. Viernes is the Plaintiff and may have information regarding the allegations in the Complaint and Answer with Affirmative Defenses.
3. Thomas M. McGreal, of Mandarich Law Group, LLP ("Mandarich"), 420 N. Wabash Avenue, Suite 400, Chicago, Illinois 60611. Mandarich is the third party law firm that commenced the underlying action against Mr. Viernes and may have information regarding the allegations in the Complaint and Answer with Affirmative Defenses.

Pursuant to Rule 26(a)(1)(A)(ii)

1. DNF is the owner of an account for an individual named Ronald Viernes and is in possession of account information for said account. DNF reserves the right to identify and produce additional documents upon which it may rely in

support of its claims in this matter in accordance with the Federal Rules of Civil Procedure and scheduling Orders of the Court.

Pursuant to Rule 26(a)(1)(A)(iii)

1. DNF has not asserted a claim for monetary damages against the Plaintiff.

Pursuant to Rule 26(a)(1)(A)(iv)

1. DNF does not have insurance coverage for the claims alleged in the Complaint.

DATED Honolulu, Hawaii, August 23, 2019.

/s/ Andrew J. Lautenbach
ANDREW J. LAUTENBACH
BRENDAN H. LITTLE

Attorneys for Defendants
DNF ASSOCIATES, LLC